

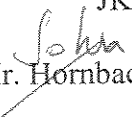


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October 21, 2005

John E. Hornback
Metro 4/SESARM/VISTAS
526 Forest Parkway, Suite F
Forest Park, GA 30297-6140

Re: Comments on Draft VISTAS and BART Protocol
MOG/VISTAS
JK Ref. Nos. 101133/401


Dear Mr. Hornback:

The Midwest Ozone Group (MOG) appreciates the opportunity to submit comments on the draft "Protocol for the Application of the CALPUFF Model for Analyses of Best Available Retrofit Technology (BART)," dated September 20, 2005. MOG believes that the BART protocol is a critical tool in the analysis of BART controls for the visibility impacts of stationary sources. To that end, MOG submitted comments to EPA on July 13, 2004, regarding the air quality modeling components of the EPA May 5, 2004 proposed BART rule. To the extent that EPA did not incorporate the MOG comments in its final rule, MOG urges VISTAS to do so in its final BART Protocol. A copy of the July 13, 2004 comments is attached and MOG incorporates those comments by reference in the comments that are being submitted today.

Inasmuch as the extensive comments submitted in 2004 dealt with the technical aspects of the air quality modeling components of the proposed BART rule, the comments MOG submits today are related to policy. Following are specific policy comments regarding the draft BART Protocol.


1. The draft protocol states at Page 1, "[t]he VISTAS states have accepted EPA's guidance to use the CALPUFF modeling system to comply with the BART modeling requirements of the regional haze rule." However, MOG notes that the EPA guidance allows for the use of appropriate alternative models, and submits that VISTAS should incorporate the use of such appropriate alternative models into its BART protocol.
2. The draft protocol states at Page 2 that, "[t] this protocol does not address a preferred modeling approach to demonstrate the effectiveness of an optional emissions cap and trade program. Such a cap and trade program is not required, but can be implemented in lieu of BART if desired by the VISTAS estates." While the draft protocol states further that VISTAS estates are deferring discussion of this option until the recently-proposed EPA trading guidance is

finalized later in 2005, MOG urges that this issue be dealt with in the final BART protocol.

3. The draft protocol states at Page 3 that in determining whether a BART-eligible source can be excluded from BART controls, the preferred approach is an assessment with an air quality model such as CALPUFF followed by comparison of the estimated 24-hour visibility impacts against a threshold above estimated natural conditions. The draft protocol properly notes that the level of natural conditions baseline that is to be used must be clarified. MOG concurs that the natural conditions baseline level is a critical portion of the analysis process and urges VISTAS to remain flexible in its BART protocol until such time as the issue is resolved at the national level.
4. The draft protocol focuses on CALPUFF modeling for assessment of air quality impacts. MOG submits that states and stakeholders must have the flexibility of using the most appropriate air quality modeling tools for the modeling components of the BART rule, with EPA review and approval, including models and procedures that are more scientifically advanced than the CALPUFF model and its derivatives.
5. The draft protocol implicitly endorses the EPA threshold value for perception of visibility change of 0.5 dV. MOG reminds VISTAS that recent research has found that a 1 dV change is virtually unnoticeable and that the deciview level that can be detected by a viewer varies over a range from 2 to 10 dV. Accordingly, MOG submits that a 0.5 dV change threshold to define when a potential BART-eligible source causes or contributes to visibility impairment at a Class I area is not appropriate because it is not perceptible. Based on research conducted in 1994 by Pitchford and Malm and by Henry in 2002, MOG believes that a 2.0 dV threshold is a more appropriate level for perceptibility.
6. The draft protocol implicitly endorses the use of the IMPROVE equation in establishing natural background levels for use in comparing with modeled impacts. MOG and others have submitted numerous comments to EPA regarding the accuracy and need for modification to the IMPROVE equation and MOG submits that the final VISTAS BART protocol must reflect use of the most accurate version of the IMPROVE equation.

MOG appreciate the opportunity to provide these comments and looks forward to working with VISTAS to develop a final BART protocol. Please call or write if you would like additional detail regarding any of the comments in this letter or in the attached technical comments submitted to EPA in 2004.

Very truly yours,


Edward L. Kropp for the
Midwest Ozone Group